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November 19, 2001

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 01-31 – Alternative Regulation

Dear Ms. Cottrell:

After the close of business on November 13, 2001, Verizon Massachusetts (“VerizonMA”) received an electronic copy of AT&T Communications of New England, Inc.’s (“AT&T”) “Motion for Leave to File Surrebuttal Testimony of Debra S. Waldbaum” with accompanying supplemental surrebuttal testimony. This letter is in response to AT&T’s Motion.

In the interests of providing the Department with as complete a record as reasonably practicable, VerizonMA does not object to AT&T’s Motion, provided VerizonMA has the opportunity to file supplemental rejoinder testimony.¹ As the Department ruled in adopting the present schedule, VerizonMA will have the opportunity to respond fully to the cases presented by other parties and will file the last round of testimony.² AT&T’s Motion should not undermine VerizonMA’s ability to respond or the order of filing testimony.

¹ Under the Department’s regulations, Verizon MA has the right to “open and close” the adjudicatory proceeding. 220 C.M.R. 1.06(6)(f).

² The Department rejected that portion of the Attorney General’s proposed schedule that allowed intervenors to file a final round of testimony. *See* for a discussion of the issue, 7/9/01 Tr. at 67, 69-70. The record will be incomplete in the absence of Verizon MA’s written testimony explaining why AT&T’s supplement does not rebut the Company’s evidence on the presence of competition in the Commonwealth. Verizon MA’s filing also is consistent with the Department’s objective of allowing Verizon MA a meaningful opportunity to file final testimony in meeting its burden of proof in this matter.

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VerizonMA's supplemental rejoinder testimony will be limited to the issues raised in AT&T's supplemental surrebuttal testimony. In that regard, VerizonMA's filing will be "helpful to create a complete and accurate record upon which to base findings and rulings, and to focus issues for the evidentiary hearings."³

In light of the intervening holiday period, the Company respectfully requests until Friday, November 30, 2001, to respond. The requested date will have no adverse impact on the remainder of the schedule.

Thank you for your attention to this matter.

Very truly yours,

/s/Victor D. Del Vecchio

Victor D. Del Vecchio

cc: Paula Foley, Esquire, Hearing Officer (2)
Michael Isenberg, Esquire, Director – Telecommunications Division
Attached Service List

mlc-01-31-11-19-01

³ *Hearing Officer Ruling* dated October 16, 2001, at 4, D.T.E. 01-31.